

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Parker O'Neil Wideman,
Plaintiff,
v.
Innovative Fibers, LLC and Stein Fibers, Ltd.,
Defendants.

Case No. 7:22-cv-00418-DCC

Riley C. Draper,
Plaintiff,
v.
Innovative Fibers, LLC and Stein Fibers, Ltd.,
Defendants.

Case No. 7:22-cv-00419-DCC

William F. Douglass and Jessica L. Douglass,
Plaintiffs,
v.
Innovative Fibers, LLC and Stein Fibers, Ltd.,
Defendants.

Case No. 7:22-cv-00420-DCC

**DEFENDANT STEIN FIBERS, LTD.'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Fed. R. Civ. P. 12(b)(2), Defendant Stein Fibers, Ltd. ("Stein Fibers") moves for an Order dismissing the claims filed by Plaintiffs Parker O'Neil Wideman, Riley C. Draper, William F. Douglass and Jessica L. Douglass (collectively, "Plaintiffs") against it in the above-captioned lawsuits. This motion is made on the grounds that this Court lacks personal jurisdiction

over Stein Fibers, Ltd, a corporation organized under New York law with no relationship to the alleged contract or incident at issue in the three lawsuits. The motion is based on the memorandum of law, including attached exhibits, filed herewith; the Court's record in the three matters; and any additional argument that may be presented to the Court.

Respectfully submitted,

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March 3, 2022
Greenville, South Carolina